4811

ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION AND PLAN REVIEW OFFSHORE OIL DRILLING PRODUCTION OR WORKOVER FACILITIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 6

1445 Ross Avenue, 6 SF-PO, Dallas, Texas 75202-2733

SPCC Case #: FY-INSP- 100063 | FRP ID: FRP-06-

SPCC Inspection Date: 2/2/10 Time: 1500 | FRP Inspection Date: Time:

Name of Facility: Lake Washington Field

Latitude: 29° 24' 19.3" 29.40536 Longitude: 89° 46' 43.5" 89.77875 Source: Plan

Facility Address/Location:

☐ Tribal Land Reservation Name: N/A

City: County/Parish: Plaquemines State: LA Zip:

Facility Contact: Henri de Launay Title: Env Coordinator

Telephone Number: 713-289-2671 Email: hdelaunay@hilcorp.com

Name of ☑ Owner/☑ Operator: Hilcorp Energy Company

Address: 1201 Louisiana St. Suite 1400

City: Houston State: TX Zip: 77002

Contact: Henri de Launay Title: Env. Coordinator

Telephone Number: Same Email: same

Synopsis of Business: Offshore oil production facility

How many employees work at this facility? 6

If unmanned, how many employees maintain this facility?

Is the Facility: ☐ Unattended ☑ Attended(☐ Daily (8 hr) ☑ Daily (24 hr) ☐ Periodically)

NAICS #: 211111

Route of Entry to Waterway: Located in Lake Washington Oil + Gas Bayou

Distance to waterway (in feet): 0

Relative direction to water body: Elevation above water body (ft): 10

SPCC inspector name: Chris Perry	FRP inspector name:
Team members: Erik Hadwin (Stort)	Team members:
SPCC Plan review by: Chris Perry	FRP review by:
Date of review: 2/2/10	Date of review:

Acknowledgement of Inspection

Company Contact: Title: EHS Coordinator

Inspector: Chris Perry Title: EPA

SPCC Insp. #: FY-INSP- 63

9679569

Memorandum Of Understanding (check all applicable descriptions)

Non-Transportation Related	Transportation Related		
☑ EPA	☐ USCG	☐ MMS	☐ OPS

Facility Type

Onshore Oil:	Offshore Oil:
☐ Production ☐ Drilling/workover	☑ Drilling, Production and Workover

☐ **Bulk Storage** (check all applicable descriptions)

☐ Aviation	☐ Federal Facility	☐ Petroleum Distributor	☐ Service Station
☐ Animal Fats & Oils	☐ Gathering Facility	☐ Petroleum Marketing Terminal	☐ Transporter (Truck/Rail)
☐ Asphalt Paving	☐ Hospital	☐ Pipeline Bulk Storage	☐ Tribal
☐ Asphalt Coatings	☐ Manufacturing, Lube/Grease	☐ Railroad	☐ Utilities
☐ Auto Dealership	☐ Marina	☐ Remediation/Recycling	☐ State
☐ Bulk Packing	☐ Military	☐ Refinery	☐ Local
☐ Concrete/Cement	☐ Mining	☐ Rental Car Company	☐ Other:
☐ Crude Petroleum	☐ Natural Gas Liquids	☐ Sand & Gravel facility	_____
☐ Farm	☐ Petrochemical	☐ School/University	

Applicable Storage Containers (check all applicable descriptions)

☑ Aboveground Storage Tanks	☐ Underground Storage Tanks	☑ Drums	☑ In-plant piping	☐ Other containers
☐ Mobile/portable storage Units	☐ Surface impoundments	☐ Lagoons	☑ Equipment	_____ _____

Storage Function (check all applicable descriptions)

☑ Transferring	☐ Distributing	☐ Processing	☐ Gathering	☑ Consuming/Using	☑ Operations

Facility Storage Capacities

AST Storage Capacity (gal):	UST Storage Capacity (gal):	Total Facility Capacity (gal):
1,209,075		1,209,075

Types of Oil Stored:

☑ Crude oil ☐ Gasoline ☑ Diesel ☐ Fuel oil ☐ Jet fuel ☐ Vegetable oil/animal fats, grease

☐ Other: _____

Qualified Facility Thresholds: ☐ <5,000 Gallons	☐ YES ☑ NO
The aggregate aboveground storage capacity is 10,000 Gallons or less *112.3(g)(1)* **AND**	☐ YES ☑ NO
The facility has had no single discharge exceeding 1,000 U. S. gallons, and the facility has had no two discharges exceeding 42 U.S. gallons within any twelve-month period in the tree years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) *112.3(g)(2)*	☐ YES ☑ NO
Is the facility considered a Qualified Facility? If YES to both questions above, **AND** the owner/operator has self certified the SPCC Plan, then check YES and complete Appendix A	☐ YES ☑ NO

GENERAL APPLICABILITY - 40 CFR 112.1

Does the facility maintain an aggregate aboveground oil storage capacity of over 1,320 gallons, and/or completely buried oil storage capacity of over 42,000 gallons? ☑ YES ☐ NO

and

Is the facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1)? ☑ YES ☐ NO

If YES to both, the facility is regulated under 40 CFR 112.

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Completely buried tanks subject to all the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281.*
- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.*
- *Any facility or part thereof used exclusively for wastewater treatment and not used to satisfy SPCC requirements.*
- *Containers smaller than 55 gallons.*
- *Permanently closed containers.*

FACILITY RESPONSE PLAN (FRP) APPLICABILITY

Does the facility transfer oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons?	☑ YES ☐ NO
Or, Does the facility have a total oil storage capacity of at least 1 million gallons, **And,** at least one of the following is true:	☑ YES ☐ NO
The facility does not have secondary containment sufficiently large enough to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.	☐ YES ☑ NO
The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.	☑ YES ☐ NO
The facility is located such that a discharge would shut down a public drinking water intake.	☐ YES ☑ NO
The facility has had a reportable discharge greater than or equal to 10,000 gallons in the past 5 years.	☐ YES ☑ NO
If YES to any of the above, the facility is a non-transportation related onshore facility required to prepare and implement a FRP as outlined in 40 CFR 112.20.	

Does the facility maintain a FRP? ☑ YES ☐ NO ☐ Not Required	FRP Number: *FRP-06-*
Does the Plan include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part 112.20(e)? *Attachment C-II*	☑ YES ☐ NO

Comment:

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC Plan – 40 CFR 112.3

Facility Startup Date:	Date of initial SPCC Plan preparation:	Current Plan version (date/number):
1950s		Nov 09

For facilities (excluding farms) in operation prior to August 16, 2002, was the Plan amended and implemented by November 10, 2010? *112.3(a)* ☑ YES ☐ NO ☐ N/A

For facilities (excluding farms) beginning operation between August 17, 2002 and November 10, 2010, is the Plan prepared and fully implemented by November 10, 2010? *112.3(a)* ☐ YES ☐ NO ☑ N/A

For facilities beginning operation after November 10, 2010, was the Plan implemented before beginning operations? *112.3(b) & (c)* ☐ YES ☐ NO ☑ N/A

Is an SPCC Plan prepared? ☑ YES ☐ NO ☐ N/A

Professional Engineer certification must include statements that the PE attests to. *112.3(d)*

He/she is familiar with the requirements of the SPCC rule. (i) ☑ YES ☐ NO ☐ N/A

He/she or his/her agent has visited and examined the facility. (ii) ☑ YES ☐ NO ☐ N/A

The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule. (iii) ☑ YES ☐ NO ☐ N/A

Procedures for required inspections and testing have been established(iv) ☐ YES ☐ NO ☒ N/A

The Plan is adequate for the facility. (v) ☐ YES ☐ NO ☒ N/A

Is the SPCC Plan fully PE certified? *112.3(d)* ☑ YES ☐ NO Date of Certification: 11/17/09

Name of Professional Engineer: Joseph Morton

License Number: 24921 State: LA

Is an SPCC Plan available for review? ☑ YES ☐ NO (During normal working hours) *112.3(e)(2)*	Is an SPCC Plan maintained on site? ☑ YES ☐ NO (For at least 4 hours/day, excluding oil production facilities) *112.3(e)(1)*

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4

Have there been reportable spills at this facility of more than 1,000 gallons? *112.4(a)* ☐ YES ☐ NO ☑ N/A

Or, has the facility had two spills of more than 42 gallons in the past 12 months? *112.4(a)* ☐ YES ☐ NO ☑ N/A

If YES to either, was information submitted to the RA as required in §112.4(a)? ☐ YES ☐ NO ☑ N/A

Date of spills: _____

If applicable, have changes required by the RA been implemented in the Plan and/or facility? *112.4(d), (e)*

☐ YES ☐ NO ☑ N/A

Comment:

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

Has there been any change of facility design (construction, operation, or maintenance) that could affect the facility's potential for discharge? *(112.5a)* ☐ YES ☐ NO ☑ N/A

If YES, was the amendment within 6 months and was a plan change ☐ Yes ☐ No or a design change ☐ Yes ☐ No

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Is the SPCC Plan reviewed and evaluated every 5 years? ☑ YES ☐ NO ☐ N/A

If amended and implemented (if necessary), is it documented in the Plan (sign off sheet)? *112.5(b)* ☐ YES ☐ NO ☑ N/A

Date of latest change: _____ Certification #: _____.

Name of PE certifying amendments *112.5(c) (Except for self certified Plans)*: _____

License #: _____ State: _____ Date of Certification: _____

Reason for amendment: _____

Comment: _____

GENERAL REQUIREMENTS FOR SPCC PLANS 112.7(a-d)	Adequately Addressed in Plan	
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? *112.7* Mgmt Personnel Name: Henri deLavney Mgmt Personnel Title: Env Manager	☑ YES ☐ NO ☐ N/A	
Does the Plan format follow the sequence in the rule? *112.7* or	☐ YES ☑ NO ☐ N/A	
If no, is a cross-reference provided?	☐ YES ☑ NO ☐ N/A	
Does the Plan call for additional facilities or procedures, methods, or equipment not yet fully operational?	☐ YES ☐ NO ☒ N/A	
If yes, are the following items discussed in the Plan? ☐ Installation ☐ Start-up	☐ YES ☐ NO ☒ N/A	
Does the Plan include a discussion of conformance with SPCC requirements? *112.7(a)(1)*	☑ YES ☐ NO ☐ N/A	
Does the Plan deviate from SPCC requirements? *112.7(a)(2)* If yes, does the plan provide:	☐ YES ☐ NO ☒ N/A	
Written documentation validating/explaining rational for non-conformance with the SPCC requirements? and	☐ YES ☐ NO ☒ N/A	
Written documentation outlining/detailing the alternative method/how it achieves environmental equivalence?	☐ YES ☐ NO ☒ N/A	

Does the Plan contain a facility diagram? *112.7(a)(3)* Does the diagram include:	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- The location and contents of each container? and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Completely buried storage tanks? and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Transfer stations? and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Connecting pipes?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is there a description in the Plan of the physical layout of the facility and includes: *112.7(a)(3)* - The type of oil in each container and its storage capacity? *112.7(a)(3)(i)*	☑ YES ☐ NO ☐ N/A ☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Discharge prevention measures including procedures for routine handling of products? *112.7(a)(3)(ii)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge? *112.7(a)(3)(iii)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Countermeasures for discharge discovery, response, and cleanup (including facility and contractor resources)? *112.7(a)(3)(iv)*	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Methods for disposal of recovered materials in accordance with applicable legal requirements? *112.7(a)(3)(v)*	☐ YES ☐ NO ☒ N/A	
- Contact list and phone numbers for the facility response coordinator, NRC, cleanup contractors, and federal, state, and local agencies who must be notified in the case of a discharge as described in §112.1(b)? *112.7(a)(3)(vi)*	☐ YES ☐ NO ☒ N/A	
Does the Plan include information and procedures for reporting a discharge (exact location, phone number, date/time of material discharged, quantity, actions taken, evacuations, notifications,(names/organizations etc.)? *112.7(a)(4)*	☑ YES ☐ NO ☐ N/A	
Does the Plan include procedures to use when a discharge may occur? *112.7(a)(5)*	☑ YES ☐ NO ☐ N/A	
Does the Plan include a prediction and description of major equipment failure(s) that could result in a discharge from the facility per *40 CFR 112.7(b)*? ☑ direction, ☑ rate of flow, and ☑ total quantity of oil	☑ YES ☐ NO ☐ N/A	
Does the Plan discuss appropriate containment and/or diversionary structures/equipment (dikes, berms, retaining walls, curbing, culverts, gutters/drain systems, weirs, boom, diversion/retention ponds, sorbent material) and is sufficiently impervious to contain oil. per *40 CFR 112.7(c)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Has it been determined in the Plan, that the installation of structures or equipment (containment) is not practicable? *112.7(d)* If YES, check ☐ **then 40 CFR Part 109 Checklist must be filled out and,** - Is the impracticability clearly demonstrated? - For bulk storage containers, is periodic integrity testing of containers and leak testing of the valves and piping associated with the container conducted? - Is a strong contingency plan per 40 CFR 109 provided? *112.7(d)(1)* - Is a written commitment of manpower, equipment, and material (to control and remove any quantity of oil discharged) provided in the SPCC plan? *112.7(d)(2*	☐ YES ☐ NO ☑ N/A ☐ YES ☐ NO ☑ N/A ☐ YES ☐ NO ☑ N/A ☐ YES ☐ NO ☑ N/A ☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

Comment: there is no cross reference in the plan. Facility is using 2 10,000 Bbl barges as storage tank. Facility worker said that they were single hulled. If so there is no containment. Plan was wrong and said that they had curbing and was connected to a sump

INSPECTIONS, TESTS, AND RECORDS 112.7(e)	Adequately Addressed in Plan	Adequately Addressed in Field
Are inspections and tests required by 40 CFR 112 conducted in accordance with written procedures developed for the facility? *112.7(e)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
If Yes, are written procedures, records of inspections and/or customary business records:		
- Signed by the appropriate supervisor or inspector?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Kept with the SPCC Plan?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Maintained for a period of three (3) years?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Comment: The plan does not state how often they are required to conduct inspection. Plan states "regularly"

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112.7 (f)	Plan Review	Field Verification
Are oil handling personnel trained on: *112.7(f)(1)*		
- The operation and maintenance of equipment to prevent the discharge of oil?	☑ YES ☐ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- Discharge procedure protocols (discovery and notification)?	☑ YES ☐ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- Applicable pollution control laws, rules, and regulations?	☑ YES ☐ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- General facility operations?	☑ YES ☐ NO ☒ N/A	☐ YES ☑ NO ☐ N/A
- The contents of the Plan?	☑ YES ☐ NO ☒ N/A	☐ YES ☑ NO ☐ N/A
Is there a designated person accountable for spill prevention? *112.7(f)(2)*	☐ YES ☑ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
Name and title of individual? _____		
Are spill prevention briefings scheduled periodically? *112.7(f)(3)*	☐ YES ☑ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
What is the schedule (minimum at least once a year)?		
☐ Monthly ☐ Quarterly ☐ Semi-annually ☐ Annual		

Comment: Plan does not state how often they conduct briefings. There is no person identified as in charge of spill prevention. No training records are maintained at the facility. All records are at corporate. ✓

Does the Plan include a risk analysis and/or evaluation of field-constructed aboveground tanks for brittle fracture after tank repair/alteration/ or when a change in service has occurred? 112.7(i)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Comment		

Does the Plan include a discussion of conformance with applicable requirements of the SPCC rule or any applicable state rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR Part 112? 112.7(j)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Comment		

QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT SECONDARY CONTAINMENT OPTION 112.7(k)	Adequately Addressed in Plan	Adequately Addressed in Field
Is there qualified oil-filled operational equipment at the facility? (Oil storage containers and associated piping intrinsic to the operation of the equipment in which the oil is present solely to support the function of the apparatus or the device.) If YES,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Has the facility had a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, and/or,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Has the facility had two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, if NO to both,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
-Has the facility met the criteria for the secondary containment option?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
If YES for either, secondary containment is required. See 112.7(c). If NO and no secondary containment is provided, then:	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Are facility procedures for inspections/monitoring program established and documented? *112.7(k) (2)(i)*	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

- Does the facility maintain a Facility Response Plan? *112.7(k) (2)(ii),* **OR**	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Is there a Contingency plan following 40 CFR part 109 (see Appendix C checklist) is provided? **AND**	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Is there a written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

Comment

OFFSHORE OIL DRILLING PRODUCTION OR WORKOVER FACILITIES 112.7 (11) (See Container Inspection Forms) **Environmental Equivalence** ☐ (If environmental equivalence declared by PE, complete Appendix D of this checklist)	**Adequately Addressed In Plan**	**Adequately Addressed In Field**
Is oil drainage collection equipment, to prevent and control small oil discharges, around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, and associated equipment utilized? *112.11(b)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are drains controlled/directed to a central collection sump, **or** is oil removed from collection equipment as often as necessary to prevent an overflow? *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
If there is a sump system, is it adequately sized? *112.11(c)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is there a spare pump or equivalent method available (redundant automatic sump pumps and control devices)? *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is there a regularly scheduled preventative maintenance inspection and testing program to ensure reliable operations of the liquid removal system and pump start-up device? *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are separators and treaters equipped with dump valves? *112.11(d)* If yes, *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Is the flare line extended to a diked area if the separator is near shore? *112.11(d)(1)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Is the separator equipped with a high liquid level sensor that will automatically shut in the wells? *112.11(d)(2)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Is there a parallel redundant dump valve installed? *112.11(d)(2)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are atmospheric storage/surge containers equipped with high level sensing devices that activate an alarm or control flow; and prevent discharges? *112.11(e)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Are pressure containers equipped with high and low pressure sensing devices that activate an alarm or control flow? *112.11(f)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are containers equipped with suitable corrosion protection? *112.11(g)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are written procedures for inspecting and testing pollution prevention equipment and systems prepared? *112.11(h)* If YES, EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Are written procedures maintained at the Facility? EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Are written procedures included in the SPCC Plan? EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is testing and inspection of pollution prevention equipment and systems (commensurate with the complexity, conditions, and circumstances of the facility and any other applicable regulations) conducted periodically? *112.11(i)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
At what frequency?		
- Daily, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Weekly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Monthly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Annual, **or**	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Other?	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
Are simulated discharges used for testing and inspecting human and equipment pollution control and countermeasure systems? EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are surface and subsurface well shut-in valves and devices sufficiently described? *112.11(j)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are detailed records for each well maintained? EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is there a blowout prevention (BOP) assembly installed and well control system utilized before drilling below casing strings or during workovers, and capable of controlling well-head pressure? *112.11(k)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are manifolds (headers) equipped with check valves on individual flowlines? *112.11(l)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are flowlines equipped with high pressure sensing device and shut-in valve at the wellhead? *112.11(m)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- If NO, is a pressure relief system provided? EE ☐	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
Are all piping appurtenant to the facility corrosion protected (protective coatings or cathodic protection)? *112.11(n)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is sub-marine piping protected against environmental stress and other operations such as fishing operations? *112.11(o)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are sub-marine piping inspected and tested periodically? *112.11(p)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

At what frequency?			
- Daily, **or**		☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Weekly, **or**		☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Monthly, **or**		☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Annual, **or**		☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Other?		☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
Are records of inspections and tests documented and maintained?	*EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Comment: There is no section covering offshore production facilities 112.7(11) in the plan.

Qualified Facilities Checklist N/A

Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

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112.6 Qualified Facility Plan Requirements	Yes	No	N/A
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan? *If **NO**, see requirements for 112.3(d) above. If **YES**, did the owner/operator certify in the Plan that:*			
(1) He or she is familiar with the requirements of 40 CFR part 112.			
(2) He or she has visited and examined the facility.			
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			
(4) Procedures for required inspections and testing have been established.			
(5) The Plan is being fully implemented.			
(6) The facility meets the qualification criteria set forth under §112.3 (g).			
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			
If **YES:** Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?			
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under §112.7(a)(2), the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112.7(a)(2).			
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), **OR** (ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			
(c)(4) Bulk Storage Containers. The Plan contains one of the following: (i) The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; **OR** (ii) The Plan complies with the requirements under §112.6(c)(4)(ii): • Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. • Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. • The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. • Container supports and foundations regularly inspected • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas			

• Records of inspections and tests maintained			
(d) Did a PE certify a portion of a qualified facility's self-certified Plan? *If **YES**, the PE must certify in the Plan that:*			
(d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.			
(b)(1) If a PE certified a portion of the Plan, did a PE certify any technical amendments that affect this portion of the Plan?			
Comments:			

Appendix B: Container Inspection Form

Container ID: 7000 SPCC Inspection #: FY-INSP-10000 63

Maximum capacity (gal): 3,000 BBL Container height (ft): 24

Nominal capacity (gal): _____ Container diameter (ft): ~30 Year Built: _____

Current Status: ☒ Active ☐ Standby ☐ Out of service ☐ Closed

Material(s) Stored in Container:

☒ Crude oil ☐ Gasoline ☐ Diesel ☐ Fuel oil ☐ Jet fuel ☐ Vegetable oil/animal fats, grease

Other: _____

Container Type:

☐ Vertical Cylindrical	☐ External Floating Roof	☐ Geodesic Dome
☒ Fixed Roof (Vented)	☐ Internal Floating Roof	☐ Spheroid
☐ Coned Roof – (Vented)	☐ Hemispheroid (Noded)	☐ Horizontal Cylindrical
☐ Coned Roof – (Not Vented)	☐ Hemispheriod (Not Noded)	Other: _____

Container Material:

☒ Single Wall Steel	☐ Not Painted	☐ Wooden
☐ Double Wall Steel	☐ Fiberglass Reinforced Plastic	Other:
☐ Painted	☐ Composite (steel with fiberglass)	GALVANIZED

Container Construction: ☐ Welded ☐ Riveted ☒ Bolted ☐ Shop Fabricated ☐ Field Erected

Container Cathodic Protection: ☒ None ☐ Sacrificial Anode(s) ☐ Impressed Current

Inspect container including the base for leaks, specifically looking for:

Drips, weeps, & stains:	Discoloration of tank:	Corrosion:
☐ Check if present and check if:	☐ Check if present and check if:	☒ Check if present and check if:
Acceptable ☐	Acceptable ☐	Acceptable ☒
Or, if Unacceptable ☐,	Or, if Unacceptable ☐,	Or, if Unacceptable ☐,
☒ Adequate	☒ Adequate	☐ Adequate

Comment on container inspection:

SMALL AREAS OF MINOR CORROSION ALONG BASE OF TANK SITS IN A OUTER CONTAINMENT PAN WHICH HOLDS H_2O.

Container Foundation Material:

☐ Earthen Material ☐ Ring Wall ☐ Concrete (w/impermeable mat.) ☒ Concrete (w/o impermeable mat.) WOOD MAT OVER GALVANIZED STEEL PAN OVER

☐ Steel ☐ Unknown Other: CONCRETE SLAB

Inspect container foundation, specifically looking for:

Cracks:	Settling:	Gaps (between tank and foundation):
☐ Check if present and check if:	☐ Check if present and check if:	☐ Check if present and check if:
Acceptable ☐	Acceptable ☐	Acceptable ☐
Or, if Unacceptable ☐,	Or, if Unacceptable ☐,	Or, if Unacceptable ☐,
☒ Adequate	☒ Adequate	☒ Adequate

Comment on foundation inspection:

Container Piping Construction:

- [x] Aboveground
- [ ] Underground
- [ ] Steel (bare)
- [x] Steel (painted)
- [ ] Steel (galvanized)
- [ ] Double walled
- [ ] Copper
- [ ] Fiberglass reinforced plastic
- [ ] Unknown

Other: ____

Inspect pipes/valves, specifically looking for:

Leaks at joints, seams, valves:
- [ ] Check if present and if:
  - Acceptable [ ]
  - **Or,** if Unacceptable [ ],
- [x] Adequate

Discoloration:
- [ ] Check if present and if:
  - Acceptable [ ]
  - **Or,** if Unacceptable [ ],
- [x] Adequate

Corrosion:
- [ ] Check if present and if:
  - Acceptable [ ]
  - **Or,** if Unacceptable [ ],
- [x] Adequate

Bowing of pipe:
- [x] Check if present and if:
  - Acceptable [x]
  - **Or,** if Unacceptable [ ],
- [ ] Adequate

Pooling of stored material:
- [ ] Check if present and if:
  - Acceptable [ ]
  - **Or,** if Unacceptable [ ],
- [ ] Adequate

Comment on piping/valve inspection:
SLIGHT BOWING of PIPE

Secondary Containment Types:

- [ ] Dikes/berms/retaining walls
- [x] Curbing
- [ ] Culverts and/or gutters
- [ ] Spill diversion ponds
- [ ] Sorbent Materials
- [ ] Retention Ponds
- [ ] Weirs and/or booms

Other – Loc.: CURBS w/ DRAINS TO SUMP SYSTEM

Secondary Containment Checklist:

- [ ] Capacity does not appear to be adequate?
- [ ] Not sufficiently impervious to stored material?
- [ ] Standing water within dike or berm?
- [ ] Erosion or corrosion of dike or berm?
  - Location: ____
- [ ] Drainage mechanism manually operated?
- [ ] Presence of stored material within dike or berm?
- [ ] Debris/vegetation within or on the dike or berm area?

Comment on containment inspection:
TANK #6000, IN SERVICE; 1,000 BBL HAS HEAVY CORROSION ALONG BASE OF TANK; TANK ~~IS ON~~ IS IN STEEL PAN THAT IS ON ~~[illegible]~~ WOOD OVER CONCRETE SLAB Hilcorp REP STATED TANK IS PLANNED TO HAVE BOTTOM REPLACED THIS YEAR (2010).

SPCC CONTINGENCY PLAN REVIEW CHECKLIST

N/A

Appendix C: 40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR, part 109. Items below must be addressed in the Plan and implemented at the facility.

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109.5 Development and implementation criteria for State, local and regional oil removal contingency plans:	Yes	No
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☐	☐
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	☐	☐
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☐	☐
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☐	☐
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	☐	☐
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☐	☐
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	☐	☐
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☐	☐
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	☐	☐
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☐	☐
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	☐	☐
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	☐	☐
(2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☐	☐
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☐	☐
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☐	☐
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☐	☐
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐	☐

NA

Environmental Equivalence (EE) Checklist

Appendix D: Environmental Equivalence Requirements

Complete this Appendix only if the facility has declared "environmental equivalence" measures as described in § 112.7(a)(2). Facility owners and operators have the flexibility to deviate from specific rule provisions if the Plan states the reason for nonconformance and if equivalent environmental protection is provided by some other means of SPCC. EE declarations must be certified by a PE. For EE declarations, see portions of checklist referenced earlier.

SPCC Citation:	SPCC Inspection #: *FY-INSP-*
Is there written documentation validating/explaining rational for non-conformance with the SPCC requirements?	☐ YES ☐ NO
Is there written documentation outlining/detailing how the alternative method achieves environmental equivalence? **and,**	☐ YES ☐ NO
Is the alternative method:	
Technically feasible?	☐ YES ☐ NO
Logistically sound?	☐ YES ☐ NO
Practicable?	☐ YES ☐ NO

Name of Professional Engineer: _____

License Number: _____ State: _____

Other PE certification requirements:

Did a PE certify a portion of a qualified facility's self-certified Plan? ☐ YES ☐ NO

Description of environmental equivalence:

Inspector Comment:

* Use additional Appendix D forms for multiple Environmental Equivalent declarations.